

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
V.	:	CRIMINAL ACTION
	:	
ALEKSANDAR KAVAJA	:	No: 2:20-cr-00202-HB-1
	:	
Defendant	:	
	:	
	:	
	:	

ORDER

AND NOW, this _____ day of _____, 2020,
upon consideration of the foregoing Petition and upon the Motion for Continuance of Andres Jalon,
Esquire, attorney for the Petitioner, it is hereby ORDERED AND DECREED that the Motion for
Continuance is granted.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

V.

ALEKSANDAR KAVAJA

Defendant

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CRIMINAL ACTION

NO: 2:20-cr-00202-HB-1

MOTION FOR CONTINUANCE OF SENTENCING

Defendant, Aleksandar Kavaja, hereby submits this Motion for Continuance of sentencing and in support thereof avers as follows:

1. Mr. Kavaja's sentencing date is scheduled for December 22, 2020.
2. Mr. Kavaja is currently incarcerated at Federal Detention Center (FDC) Philadelphia.
3. FDC Philadelphia is currently experiencing extremely high rates of infection of COVID-19 which has prevented outside visits from attorneys.
4. Counsel has been unable to meet with Mr. Kavaja to prepare him for sentencing, and it is unknown when this lockdown will be lifted allowing counsel to enter the facility.
5. Further, while counsel has hired an interpreter, Mr. Kavaja's family has very recently, in the past week, sent over documents and letters related to the sentencing which must be translated.
6. United States Attorneys, Kelly Harrell, Esquire and Jerome Maiatico, Esquire do not object to the continuance.

7. In the interest of justice, Defense Counsel would like to meet with Mr. Kavaja to adequately prepare him as well as have all documents and letters translated prior to sentencing.
8. Counsel for Defendant respectfully requests a 60-day continuance for Mr. Kavaja's sentencing hearing.

WHEREFORE, Defendant, Aleksandar Kavaja, requests that this Honorable Court grant his Motion for Continuance.

/s/ Andres Jalon, Esquire _____
Andres Jalon, Esquire
Jalon & Associates
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Philadelphia, PA 19102
215-844-8444; Fax: 215-985-3610
ajalon@jalonesq.com
Counsel for Defendant Aleksandar Kavaja

Dated: December 1, 2020

CERTIFICATE OF SERVICE

I, Andres Jalon, hereby certify that on this 1st day of December 2020, a true and correct copy of the foregoing Motion to Continue Sentencing was served via Electronic Filing System on the below listed persons:

Kelly Harrell, Esquire
Jerome Maiatico, Esquire
Assistant U.S. Attorney
United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, Pennsylvania 19106

/s/ Andres Jalon, Esquire
Andres Jalon, Esquire
Jalon & Associates
1500 John F. Kennedy Blvd., Ste. 1300
Philadelphia, PA 19101
215-844-8444; Fax: 215-985-3610
ajalon@jalonesq.com
Counsel for Defendant Aleksandar Kavaja

Dated: December 1, 2020

CERTIFICATION OF CONCURRENCE

Andres Jalon, Esquire, hereby certifies that Assistant United States Attorney Jerome Maiatico and Kelly Harrell concur with Counsel's request for a continuance.

/s/ Andres Jalon, Esquire

ANDRES JALON, ESQUIRE
JALON & ASSOCIATES
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For Defendant Francis Familia Vasquez

Dated: December 2, 2020